

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JEAN PIERRE,

Defendant.

SUPERSEDING INFORMATION

S4 22 Cr. 19 (PGG)

COUNT ONE

(Making and Subscribing False Tax Returns)

The United States Attorney charges:

1. From in or about 2016 to in or about 2020, in the Eastern District of New York, JEAN PIERRE, the defendant, a resident of Bayonne, New Jersey, did willfully make and subscribe joint Forms 1120S U.S. Income Tax Returns for S-Corporations, for the calendar years 2016 to 2019, for JAP Multi Services Inc and Tort Cash LLC (collectively, the “Businesses”), which were prepared and signed in the Eastern District of New York, and which were filed with the Internal Revenue Service, and which were verified by written declarations that they were made under the penalties of perjury and which PIERRE did not believe to be true and correct as to every material matter, to wit, PIERRE failed to report income and falsely claimed business expenses, and therefore underreported the true income of the Businesses and did not pay taxes on the true income of the Businesses.

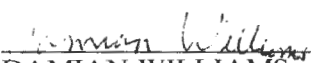
2. JEAN PIERRE, the defendant, willfully made and subscribed to false Forms 1120S U.S. Income Tax Returns for S-Corporations, for the calendar years 2016 to 2019, for JAP Multi Services Inc on the following dates:

Calendar Year	Date of Tax Filing
2016	2017-03-15
2017	2018-04-29
2018	2019-03-15
2019	2020-03-15

3. JEAN PIERRE, the defendant, willfully made and subscribed to false Forms 1120S U.S. Income Tax Returns for S-Corporations, for the calendar years 2016 to 2019, for Tort Cash on the following dates:

Calendar Year	Date of Tax Filing
2016	2017-03-14
2017	2018-05-15
2018	2019-03-15
2019	2020-03-15

(Title 26, United States Code, Section 7206(1).)


DAMIAN WILLIAMS
United States Attorney